



PORT OF BELLINGHAM

Washington State

December 5, 2006

Lucille T. McInerney, P.E.
Site Manager
Department of Ecology
3190 160th Avenue
Bellevue, WA 98008-5452

Re: Whatcom Waterway Site

Dear Ms. McInerney:

Please find enclosed Resolution #1241 by the Commission of the Port of Bellingham, recommending Alternative 6 for selection by the Department of Ecology as the cleanup action plan for the Whatcom Waterway site under the Model Toxics Control Act.

As described in the resolution, Alternative 6 ranks highest under the applicable regulatory criteria outlined in the October 10, 2006 Remedial Investigation and Feasibility Study for the Whatcom Waterway site, and would provide a safe and effective cleanup, consistent with the current land use planning by the Port and City of Bellingham for the waterfront.

We at the Port look forward to our ongoing partnership with you and the Department of Ecology as we move forward on the cleanup of the Whatcom Waterway. Please feel free to contact me, should you have any questions about the Port's position.

Sincerely,


James S. Darling
Executive Director

Enclosure

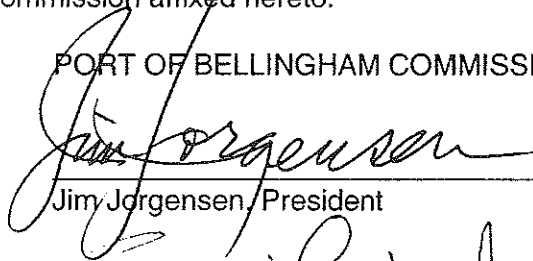
"preferred" alternatives, because it ranks highest under the applicable regulatory criteria, and would provide a safe and effective cleanup, consistent with the current land use planning by the Port and City of Bellingham to revitalize the waterfront, according to the community's vision; and

WHEREAS, the estimated cost of Alternative 6 is \$44 million, for which the Port has a viable funding plan, supported through multi-million dollar state grants which have been identified as a priority by both the Department of Ecology and the Governor of the State of Washington.

NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners of the Port of Bellingham, Washington, that Alternative 6 is recommended for selection by the Department of Ecology as the cleanup action plan for the Whatcom Waterway site under the Model Toxics Control Act.

ADOPTED in open session at a meeting of the Commission of the Port of Bellingham on the 5th day of December 2006, and duly authenticated by the signatures of the Commission and the seal of the Commission affixed hereto.

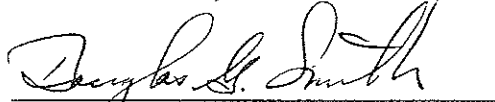
PORT OF BELLINGHAM COMMISSION

A handwritten signature in cursive script, reading "Jim Jorgensen", written over a horizontal line.

Jim Jorgensen, President

A handwritten signature in cursive script, reading "Scott L. Walker", written over a horizontal line.

Scott L. Walker, Vice President

A handwritten signature in cursive script, reading "Douglas G. Smith", written over a horizontal line.

Douglas G. Smith, Secretary

RESOLUTION NO. 1241

A RESOLUTION OF THE COMMISSION OF THE PORT OF BELLINGHAM, RECOMMENDING PREFERRED ALTERNATIVE NO. 6, AS DESCRIBED IN THE OCTOBER 10, 2006 DRAFT SUPPLEMENTAL REMEDIAL INVESTIGATION AND FEASIBILITY STUDY FOR THE WHATCOM WATERWAY SITE, TO THE WASHINGTON STATE DEPARTMENT OF ECOLOGY.

WHEREAS, the Port of Bellingham ("Port") and the Washington State Department of Ecology ("Ecology") have been working together since 1996 as co-managers of the Bellingham Bay Demonstration Pilot; and

WHEREAS, following closure of the local Georgia-Pacific pulp mill operations in 2001, the Port and the City of Bellingham have been working together to revitalize the waterfront by supporting a new mix of uses including light industry, business, academic, residential, moorage, public access, and habitat restoration; and

WHEREAS, in January 2005, following an extensive public involvement process, the Port acquired 137 acres of waterfront property from Georgia-Pacific, including significant areas of the Whatcom Waterway site such as shorelines, the Log Pond and the Aerated Stabilization Basin, in order to implement the community's vision for revitalizing the waterfront; and

WHEREAS, through interlocal agreement, the Port and City of Bellingham have determined that the most appropriate re-use of the Aerated Stabilization Basin is for a "Clean Ocean Marina", including public access, marine habitat and expanded moorage capacity; and

WHEREAS, in November 2005 the Port and the Washington Department of Natural Resources agreed in a Memorandum of Understanding that the current Whatcom Waterway federal channel, state waterway and harbor area designations should be updated to better reflect the current changes in the local economy, land uses, land use plans and navigation needs for the community waterfront; and

WHEREAS, the Port, as local sponsor for the Whatcom Waterway federal channel, has recommended that the channel be maintained adjacent to the Bellingham Shipping Terminal to support deep draft operations, but converted to a locally managed multi-purpose waterway in the inner portion of the channel; and

WHEREAS, the Port and Georgia-Pacific have entered into an Agreed Order with Ecology to update the Remedial Investigation/Feasibility Study ("RI/FS") and Environmental Impact Statement ("EIS") for the Whatcom Waterway site in order to reflect the results of recent sampling investigations, improving environmental conditions, changes in property ownership and the development of new waterfront land use plans; and

WHEREAS, the updated RI/FS and EIS for the Whatcom Waterway site have been issued for public comment by Ecology with Alternative 6 identified as one of the



OFFICE OF THE MAYOR
210 Lottie Street, Bellingham, WA 98225
Telephone: (360) 676-6979 Fax: (360) 738-7418

December 1, 2006

RECEIVED

DEC - 5 2006

Port of Bellingham

Lucille McInerney
Site Manager
WA Department of Ecology
3190 160th Avenue
Bellevue, WA 98008-5452

Re: Whatcom Waterway site cleanup

Dear Ms. McInerney:

On behalf of the City of Bellingham, I am writing with regard to the recently released Remedial Investigation/Feasibility Study (RI/FS) and Environmental Impact Statement (EIS) related to the Whatcom Waterway.

The City of Bellingham has already committed support through an interlocal agreement with the Port of Bellingham to the Port's preferred cleanup plan. We would like to reiterate that support to the Department of Ecology, and offer a few additional comments with regard to the documents that have been released to the public.

The community's vision for the waterfront is dependent on a cleanup plan that will support all that we hope to accomplish on the waterfront. New habitat, public access, a mix of uses, deep water shipping, jobs and residences are all part of that vision. Cleanup Alternatives 5 and 6 support that vision by protecting the health of humans and the environment and effectively mitigating the impacts of the long-time use of this area for heavy industry within a realistic time frame and cost. The City appreciated that in addition to the applicable regulatory criteria, the eight alternatives were rated against the long-standing goals of the Bellingham Bay Pilot Program.

The proposed dredging and hard-capping of the log pond shoulder area is essential to ensure long-term protection of the log pond cleanup and habitat restoration. The erosion that has occurred thus far indicates the current cap is insufficient, and the City supports a cleanup plan that addresses that issue. Also, adequate deep dredging the shipping terminal is essential to ensuring that resource for future economic development opportunities. Alternative 6 is the best option to address these two needs.

Accomplishing a safe and effective cleanup within a reasonable time period at a fundable cost is a remarkable feat. Alternative 6 is the recommended alternative of the City of Bellingham as the cleanup action plan for the Whatcom Waterway site.

Sincerely,

Tim Douglas
Mayor, City of Bellingham


COPY

From: Kirsti Charlton [kirsticharlton@gmail.com]
Sent: Sunday, November 26, 2006 12:52 PM
To: McInerney, Lucy (ECY)
Subject: Bellingham Bay Clean-up
Lucille T. McInerney, P.E. Site Manager
Washington State Department of Ecology
Northwest Regional Office
3190 160th Avenue
Bellevue, WA 98008-5452

Dear Ms. McInerney :

I am contacting you via email because of our concerns for the future environmental health and safety of Bellingham Bay and present and future residents and visitors to Bellingham and Washington State.

Yes, I'm referring to the mercury deposits in the relatively shallow waters of Bellingham Bay. I think this is a project that requires total clean-up, not just a cover-up (capping). Bellingham Bay should be as free of toxins as possible. Our residents and visitors should be able to eat seafood from the Bay without environmental and health concerns and cautions. Our grandchildren should be able to say, "they did the right thing."

I am aware that the "right" thing is expensive, that dredging the mercury and removing it from the sea bed still has certain risks of contamination. However, from our standpoint, now is the time to spend the money to remove, not cover up, as much of the mercury as possible, for an environmental future that will have fewer, later risks of contamination. It's regrettable that nearly 40 years ago, when I moved to Bellingham, that we, as a scientific and residential community, did not realize, or accept, the kind of health and environmental risks being created. Our knowledge and concern is so much greater now. Let's make the Bay as clean as possible, for as many uses as possible, with the lowest amount of risk, now and in the future. Let's clean, not cap.

Thank you for considering this input.

Sincerely,

Fred and Kirsti Charlton
1410 Grant St.
Bellingham WA 98225

tel: 360-671-0708

From: Anna Evans [aevans@bbayf.org]
Sent: Friday, October 27, 2006 12:31 PM
To: McInerney, Lucy (ECY)

Attachments: Bellingham Bay Full Report 0406[1].pdf; BBF 2006 Frequency Report, FINAL.rtf
Hi Lucy,

It was nice to finally get a chance to meet you last night. Thanks again for all your work in making the presentation a success. I do have a couple of preliminary comments I'd like to offer for the record.

First, I noticed that last night's presenters repeatedly referred to proposed land-use changes in the Whatcom Waterway as what "the community" wants. While it's certainly true that there's a great deal of excitement within our local community about possibilities for the downtown waterfront, there is likewise significant disagreement about the best uses for large portions of the area, especially with regard to the ultimate fate of the ASB lagoon. In fact, independent polling conducted last spring by Elway and Associates showed that 56% of local citizens preferred the ASB be redeveloped as "a large central park," as opposed to 30% who agreed it should be a marina. A more detailed poll conducted by Applied Research Northwest found similar results. I've attached summaries of both these polls for your review (the park/marina question is #16 in the ARNW poll). The Port of Bellingham appears to have convinced our city officials that a downtown marina is the best use for the ASB, but as these polls demonstrate, this does not necessarily reflect the opinion of public at large. In fact, if the opinion of "the community" were taken into account, a cleanup alternative such as #3 in the current RI/FS might well score higher according to the land-use criteria. At the very least, in the interests of accuracy, I would hope that your representatives clarify that it is the Port of Bellingham, not "the community," that wants a marina in the ASB.

Secondly, I'd like to comment on the issue of a possible public hearing on the RI/FS. I've already signed a petition requesting a hearing, so this comment shouldn't count as an additional "vote." But as I discussed with Shannon Sullivan last night, there is already a great deal of public skepticism about the authenticity of this process. Of course your agency has nothing to do with the Port's handling of the redevelopment proposals thus far, but for better or worse, the RI/FS comment process runs the risk of being widely perceived as part of a larger pattern of institutional obfuscation and arrogance that pays heed to public process in name only. A formal hearing would surely help assuage doubt about the credibility of Ecology's commitment to public participation. Our understanding is that MTCA regulations require DOE to schedule a hearing if fifty people request one. Is this correct?

Thanks for your attention, Lucy.

Yours,

Anna Hall Evans
Bellingham Bay Foundation
1208 Bay Street, Suite 101
Bellingham, WA 98225
360-527-2733

To find out how you can help make Bellingham's waterfront clean and healthy for all of us, visit our websites at www.bbayf.org or www.ahealthybay.org

Bert and Elizabeth Comments on RIFS for Bellingham Bay Cleanup
From: Bert Rubash and Elizabeth Kilanowski [kilaruba@copper.net]
Sent: Tuesday, October 31, 2006 2:34 PM
To: lpeb461@ecy.wa.gov.
Subject: Comments on RI/FS for Bellingham Bay Cleanup

Below are comments on the Supplemental Remedial Investigation & Feasibility Study, Volume 1: RI Report, Part 3, Environmental Setting, Section 3.1, Physical Conditions, Subsection 3.1.2, Surface Water and Circulation Patterns, prepared by The RETEC Group, Inc.

This subsection was chosen for review because it doesn't appear to have been as carefully crafted as the rest of the RI/FS, although it contains an elaboration of a key operational assumption that informs and justifies the larger project. A statement of that assumption might be: 'We know enough about the dynamics of the bay to reliably predict where to look for the remains of Georgia Pacific's toxic waste, where it would be safe to leave some of it, how safe leaving it there would be, and how to monitor the security of what's left.'

Sediment source.

To make such an assumption we would need good estimates of the physical quantities involved. Unfortunately, one of the first quantities given, the annual discharge for the Nooksack River is ambiguous and unreferenced (1). The figure, 650,000 cubic meters of sediment discharge, is 5274 times smaller than the USGS figure for the mean water discharge for the years 1967-2000 at Ferndale: 3839 cfs (= 109 cubic meters/second => 3,430,000,000 cubic meters/year) (2). Combining the two discharges we have $1,000,000/5274 = 190$ cubic centimeters of sediment in an average meter of Nooksack water. That's a little less than a cup, surprising, but reasonable. Was sediment volume measured, derived, guessed? We shouldn't have to wonder about its source, meaning, and validity. Are we be expected to search through the references listed at the start of the subsection (3) to find which document and which page contains the estimate and describes how the estimate was made?

Water exchange.

Less reasonable than the sediment volume figure is the assertion on page 3-6 that "The residence time for water in Bellingham Bay is typically four to five days, but varies between one and eleven days."

Studies of lakes and estuaries employ three measures of renewal, residence time, age, and flushing time (4).

Residence time, is the time elapsed from a water parcel's entry at a specified starting point until its departure. Age is the time elapsed since a parcel entered a water body, and the age of a water body is the average age of all water parcels. Flushing time, a more general measure, is the ratio of total volume (or mass) of water to its rate of renewal due to flow across boundaries. Flushing time is often also called residence time.

The context of RETEC's residence time assertion is a discussion of "oceanic" waters "entering" and of water "exchange", not a discussion of particular water masses or of masses from a particular source, so it seems safe to assume that flushing time or something close to it is what RETEC had in mind.

We can approximate RETEC's derivation of the residence time figure by assuming that the bay is thoroughly mixed on a time scale much smaller than the residence time, and by assuming that water flows through the bay, not in and out of the bay. (Assume a river, not an estuary.)

The surface area of the semi-enclosed region between Samish Island and the Nooksack delta is 250,000,000 square meters; the volume of water is

Bert and Elizabeth Comments on RIFS for Bellingham Bay Cleanup
5,650,000,000 cubic meters, in round figures (5). Using a tidal range of 3 meters, a tidal cycle of $24 \frac{2}{3}$ hours, and Nooksack discharge of 9,680,000 cubic meters per tidal cycle derived from the USGS discharge figure above, we would have $3 \times 250,000,000 / 24 \frac{2}{3} = 30,400,000$ cubic meters per hour moving through. It would take $5,650,000,000 / (24 \times 40,540,000) = 7.7$ days to exchange the water in the bay at that rate, hence the "typically four to five days but varies between one and eleven days" assertion in the RI/FS, although the shorter times require more radical assumptions. A 4 meter tidal range would yield 5.8 days.

This may be a good estimate of water volumes surging back and forth past the southern end of Lummi Island, but it is not a good estimate of water exchange in the bay, that is, of residual tidal flow. The thoroughly mixed and through-flowing water assumptions are fatally unrealistic: the bay has strong vertical density stratification, and the tides flow in and out; residual tidal flow (over a cycle) is much smaller than instantaneous flow for most of the bay, approaching instantaneous flow rates only near the open boundaries.

The areas and volumes used above are taken from the model configuration for the work described in a poster at the June 4-9 2006 American Society of Limnology and Oceanography conference in Victoria. That poster described detailed computing and mapping of the flushing time of Bellingham Bay. Normal overall flushing time for the bay was determined to be 485 hours (20 days) with much longer times, an order of magnitude longer for a region of bottom waters in the northern part of the bay (5).

Sediment accumulation.

Using information in subsection 3.1.2 to estimate the sediment available for deposition illustrates how that subsection is related to the larger remediation project. In that subsection we read that "there is a net southward flow throughout Bellingham Bay at depth, largely resulting from the lateral and vertical spreading of the Nooksack River discharge." We have read in 3.1.2 that the bay is an active water body with a residence time of a few days. 650,000 cubic meters of sediment is carried into that net southward flow. In such conditions sediments would be carried far and wide beyond the edge of the delta into the bay, sediments that would provide the natural capping of toxin containing sediments discussed in the RI/FS. (We also made the contrasting assumption that Georgia Pacific's waste settled near where it was dumped.)

How much capping we can expect? If we make the conservative assumptions that the accumulation on the tide flats at the delta does not divert a significant part of the sediment load, and that all of the sediment settles in the northern third of the bay, we can expect that 650,000 cubic meters of sediment will be spread over $250,000,000 / 3$ square meters, which is 0.78 centimeters annual accumulation.

The empirical analysis in Section 6.2.1, Table 6-1 of the RI/FS indicates twice that rate of deposition in the inner harbor area, 1.6 centimeters per year. This discrepancy means that the estimate of the amount of sediment available is too low, or that Squalicum and Whatcom creeks supply significant sediment, or that sediment deposition is uneven and presently greater in the area of the inner harbor.

If sediment deposition is uneven, how confident can we be that circulation, and the related depositional and erosional patterns will not change with land use changes and with climate change? A 1961 University of Washington master's thesis on Bellingham Bay sediments states that the growth rate of the sediments over the last 70 years is 900,000 cubic yards (823,000 cubic meters) per year, and that the growth of the delta in that period "is nearly as great as the total previously existing delta" (6). That statement should warn us that present sedimentation rates in the bay are transitory.

Bert and Elizabeth Comments on RIFS for Bellingham Bay Cleanup

The geography and dynamics of sediment transport in the bay are also transitory, far more transitory. The largest Nooksack channel through the tide flats meanders along the northeastern shore, and conveniently directs the heaviest sediment plume toward Boulevard Park. How rapidly will that change; how soon will it meander elsewhere; how quickly will one of the meandering western tide flat channels deepen and carry the heaviest load to the west side of the bay? In short, how securely can we trust that some of the depositional environment we are counting on will not become erosional?

RI/FS improvement.

If the role of the RI/FS is to provide a basis for public confidence that enough is known about how the bay works to plan for safe, comprehensive remediation of Georgia Pacific's toxic legacy, then it needs improvement. Below are three suggestions.

The RI/FS needs better overall consistency. Since sediment deposition is predicted and required, it needs a sediment budget, a geographic sediment budget that accounts for delta growth and for transport dynamics.

The RI/FS also needs a mercury budget in order for the public to gage how well mercury itself, and the other toxins in the inner bay sediments are encompassed by the RI/FS.

A final suggestion to improve Subsection 3.1.2 would be to edit all unsubstantiated assertions: everything submitted for public review should be substantiated by derivations or by field data with documentation of methods, or by references that lead to derivations or field data. Everything that is not substantiated should be clearly identified as public relations information not intended for review. Expecting the public to trust the undocumented assertions of consulting experts is contrary to democratic principles and not a proper function of public agencies.

Bert Rubash
Physical Oceanographer
Raincoast GeoResearch
kilaruba@copper.net

(1) "The Nooksack River is also the primary source of sediments to the bay, with an annual discharge of 650,000 cubic meters." quoted from page 3-5 of the RI/FS.

(2) See <http://wa.water.usgs.gov/realtime/adr/2000/data/12213100.2000.sw.pdf> for USGS discharge data.

(3) "Collias et al. (1966), Shea et al. (1981), and Broad et al. (1984) have previously described the physical oceanography of Bellingham Bay. In addition, a recent study of inner Bellingham Bay currents was performed by Colyer (1998)." quoted from page 3-5 of the RI/FS.

(4) See Monsen, N.E., Cloern, J.E., Lucas, L.V., and Stephen G. Monismith, G., 2002. A comment on the use of flushing time, flushing time, and age as transport time scales. *Limnol. and Oceanogr.* 47: 1545-1553.

(5) Consistent and Accurate Calculation of Estuarine Flushing in Bellingham Bay Using an Ocean Circulation Numerical Model, Rubash, L, L, Kilanowski, E, M, <http://www.sgmeet.com/aslo/victoria2006/>.

(6) Richard W. Sternberg, 1962, Recent Sediments in Bellingham Bay, Washington, Master of science thesis, University of Washington, page 57.



PACIFIC CRUISES NORTHWEST, INC. - 355 HARRIS AVENUE, SUITE 104 - BELLINGHAM, WA 98225
360.738.8099 - 800.443.4552 - FAX 360.738.7685

14 November 2006

Lucille T. McInerney, P.E.
Site Manager
Department of Ecology
3190 160th Place
Bellevue, WA 98008-5452

RE: Whatcom Waterway Site Cleanup.

Dear Ms. McInerney:

I would like to be included in the written comments for the above mentioned cleanup project.

In reviewing the benefits and impacts of the eight alternative cleanup options I find options 5 and 6 to be the most practical and preferable.

Of paramount importance in this plan are 1) maintaining deep-draft navigation near the shipping terminal and, 2) removing contaminants from the ASB required to create a new marina space.

Beyond dredging required for navigational use I believe capping the sediments in place to be preferable to attempting removal of the contaminants.

Again, please register my support of Alternatives 5 and 6 in the waterway cleanup plan.

Sincerely,

Captain Drew M. Schmidt
President

November 27, 2006

Lucille McInerney, Site Manager
Department of Ecology
3190 160th Ave
Bellevue, WA, 98008-5452

Dear Ms McInerney

I am writing to voice my support for the conversion of the GP treatment lagoon to a marina facility and would like to have my comments included in the record of the Public Hearing to be held on Dec 11 in Bellingham.

In my opinion, restoring lost or degraded shallow water estuarine habitat is one of the most important objectives in considering redevelopment plans for the old GP site. To fill in the treatment lagoon will result in the permanent loss of the land to the estuarine system.

Some argue that marinas should not be considered to have estuarine habitat value. I disagree. Over the years I have frequently seen clear evidence of an active ecosystem in the Squalicum harbor marinas. In the spring schools of small salmon – probably chums from the Maritime Hatchery can be seen taking shelter among the floats. Historically, I have, during the periods of clear water in late January, caught smelt off the docks in their annual migration through Bellingham Bay. It is common to see Western Grebes, Common Loons and Cormorants fishing inside the marinas, and in the winter there is usually a group of golden eyes (that feed on shellfish) frequenting the marina.

The skeletons of Dungeness crab are obvious on the docks, left by feeding otters. At low tides, sea stars are common on the bottom, and the pilings are covered with a thick growth of marine organisms at low tide.

People have commented to me that because there is a low diversity of organisms on the floats that the water quality of the marina must be polluted from the moored boats. This is not the case. As the Nooksack River increases flow with rain events in the winter a surface layer of fresh water flows through the marinas. Only a few estuarine organisms

are tolerant of this periodic fresh water. However, what is there, is there in profusion. The stringy brownish plant growth that covers the floats is a rich growth of diatoms. If we look closer at the small animals in among the mussels and barnacles, we find large members of small crustaceans that are food for juvenile fish

In all, these casual observations clearly show that the Squalicum Harbor marinas have a thriving estuarine ecosystem. Over the years I have noted that the boat owners of the marinas are slowly becoming more responsible for the pollution associated with their vessels. I expect that the new marina will have responsible tenants and that there will be a healthy ecosystem that will be part of the estuarine complex associated with Whatcom Creek and the Nooksack River.

If I can provide any further assistance in forwarding the proposal of restoring the lagoon site please contact me.

Sincerely

Bert Webber
Professor Emeritus, Huxley College of the Environment.

October 31, 2006

RE: Prefer Alternative #5

After review of the Whatcom Waterway Site background, and the summary of clean up alternatives - their impacts, benefits and mitigation, I prefer Alternative #5. The recommendation balances cost with benefits; provides a responsible method of caring for the environment; and it permits a reasonable restoration time frame, which benefits the community as a whole. In addition, Alternative #5 meets two important criteria - financial and environmental stewardship.

A handwritten signature in cursive script that reads "Laura Carter".

Laura Carter
1544 Toledo Court
Bellingham, WA 98229

NORTHWEST MARINE SYSTEMS LLC

21 November 2006

Ms. Lucille T. McInerney, P.E.
Site Manager
Department of Ecology
3190 160th Avenue
Bellevue, WA 98008-5452
VIA E-MAIL: lpeb461@ecy.wa.gov

Ms. McInerney:

We write regarding the clean-up strategy for the Whatcom Waterway Site in Bellingham, Washington. After carefully reviewing relevant materials, we are convinced **Alternative 6 is the preferred alternative** for site remediation, environmentally sound clean-up, and the benefit of the community as a whole.

The 137 acre Georgia-Pacific site, transferred to the Port of Bellingham in January 2005, offers an unparalleled opportunity to convert contaminated former industrial land into one of the West Coast's most attractive waterfronts. The positive effect on Bellingham's waterfront and downtown core is difficult to overstate. Alternative 6 will allow full site utilization – providing housing, jobs, recreation, and waterway access in appropriate locations consistent with community-oriented redevelopment.

Here in Bellingham, we have the advantage of extremely competent leadership at both the Port of Bellingham and the City of Bellingham, leadership uniquely committed to a coherent long-range, community-based vision for Bellingham's waterfront. With that in mind, we join the Port of Bellingham and the City of Bellingham in recommending Alternative 6 as the preferred site clean-up alternative.

In assessing the risk of projects undertaken by the federal government, the U.S. Army Corps of Engineers uses a three-part test, known as "The Three E's" of project due diligence: (1) engineering justification; (2) economic viability; and (3) environmental acceptability. Each factor is equally important and must be carefully balanced with each other.

Given the federal government's inevitable participation in funding and permitting, it is conceptually useful to consider the Whatcom Waterway Site clean-up from their perspective. Of the proposed alternatives, it is obvious that Alternative 6 will best address and balance environmental and public safety considerations with redevelopment potential and cost. Alternative #6 does this by ensuring the full site can be used for redevelopment (including development of a public marina in the Aeration Stabilization Basin), while using approved methods to dredge, cap and provide for shoreline stabilization.

Alternative 6 also rates best applying MTCA standards, receiving a High overall MTCA ranking,, meeting all MTCA threshold criteria, with restoration time frame the lowest of all eight alternatives under consideration. Overall MTCA benefits are rated as High, with Alternative 6 providing the best cost to benefit ratio. Also of importance to DOE's MTCA analysis, Alternative 6 is permanent to the maximum extent practicable.

As a Canadian citizen born and raised in Vancouver B.C., I had the opportunity to witness Vancouver's dramatic rebirth – occasioned in large measure by that city's commitment to waterfront redevelopment. Today, Vancouver – and the False Creek / Granville Island area in particular – is an internationally-known destination, and the hub of a vibrant urban community.

A great deal of Vancouver's success can be directly attributed to decisive leadership, which allowed Vancouver to maintain positive forward momentum in waterfront redevelopment plans despite the complexity and scope of the task at hand.

Decisive leadership is even more important in Bellingham's case, because time is of the essence. As anyone familiar with growth patterns in the Puget Sound basin can attest, Bellingham and Whatcom County face tremendous growth pressure. Every day, sprawl drains capital, political will, and vitality away from waterfront and downtown redevelopment. Accordingly, delay in waterfront clean-up will promote sprawl, traffic, and infrastructure problems in one of the Northwest's last remaining gems, Whatcom County.

On the other hand, a decisive plan for waterfront clean-up will unarguably spark tremendous investment in Bellingham's urban core. Therefore, moving forward without delay will not only serve the interests of the Bellingham community, but will help implement the policies of the Growth Management Act on a region-wide basis – a mission with which the Department of Ecology is statutorily charged. While diligent and thorough clean-up analysis is paramount, we also hope you will continue to proceed decisively.

We strongly recommend adoption of Alternative 6 as the preferred site clean-up alternative. We thank you for the opportunity to comment, and request that you make this letter part of the official record of this matter.

Very Truly Yours,

Mr. Chris Hughes

Bcc: Jim Darling, POB Executive Director
Tim Stewart, COB Planning Director